

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MAI-AJAH KEEL,	)	
	)	
Plaintiff,	)	
v.	)	Case No. 1:17-cv-01818 MN
	)	
DELAWARE STATE UNIVERSITY	)	
BOARD OF TRUSTEES; CANDY	)	
YOUNG, in her individual capacity;	)	
PAULA DUFFY, in her individual capacity;	)	
and RANDOLPH JOHNSON, in his	)	
individual capacity,	)	
	)	
Defendants.	)	

**STIPULATION TO FILE A CORRECTED COMPLAINT AND TO  
EXTEND TIME FOR PLAINTIFF TO FILE AN OPPOSITION  
TO DEFENDANTS' MOTION TO DISMISS**

**I. STIPULATION TO FILE A CORRECTED COMPLAINT**

WHEREAS, Plaintiff, Maj-Ajah Keel, filed her Amended Complaint on March 25, 2019 at DI# 25;

WHEREAS, Plaintiff's Amended Complaint referenced an individual defendant not previously named in Plaintiff's original complaint;

WHEREAS, Plaintiff inadvertently referenced this additional defendant and did not intend to bring any claims against him;

WHEREAS, Plaintiff seeks leave to file a corrected Amended Complaint removing all reference to this inadvertently added defendant;

WHEREAS, Plaintiff's corrected Amended Complaint would make no other changes to the previously filed Amended Complaint;

WHEREAS, Plaintiff and Defendants agree that filing of a corrected First Amended Complaint shall not alter the deadlines to respond to Defendants' Rule 12(b)(6) Motion to Dismiss Plaintiff's First Amended Complaint ("Motion to Dismiss") except as set forth herein.

**II. STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE AN  
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

WHEREAS, in response to Plaintiff's First Amended Complaint, Defendants filed the Motion to Dismiss on April 23, 2019 at DI# 28;

WHEREAS, Plaintiff's deadline to respond to Defendants' Motion to Dismiss is currently May 7, 2019;

WHEREAS, Plaintiff requested, and Defendants agreed, to a two week extension of Plaintiff's deadline to respond to Defendants' Motion to Dismiss;

WHEREAS, the requested extension would not affect any other dates in this Action;

IT IS HEREBY STIPULATED between the Parties, by and through their undersigned attorneys, and subject to approval by the Court, that (1) Plaintiff may file a corrected First Amended Complaint, (2) briefing will continue on the pending Motion to Dismiss, (3) Plaintiff's new deadline to respond to the Motion to Dismiss is May 21, 2019 and (4) the Defendants may file a reply in accordance with Local District Court Rule 7.1.2 (b).

*[Remained of page left intentionally blank]*

Dated: April 25, 2019

**PACHULSKI STANG ZIEHL & JONES  
LLP**

/s/ Laura Davis Jones

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-and-

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*Counsel for Defendants Delaware State  
University Board of Trustees, Candy Young,  
Paula Duffy and Randolph Johnson*

PURSUANT TO THE STIPULATION IT IS SO ORDERED,

Dated: April\_\_, 2019

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United States District Court Judge  
Maryellen Noreika